

Ernest Warren, Jr. OSB 891384
Warren & Sugarman
Suite 500, 838 SW First Avenue
Portland, Oregon 97204
Tel: (503) 228-6655
Fax: (503) 228-7019

Attorney for Defendant Eric Lee Flores

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Case No. 3:16-CR-00051-25-BR

Plaintiff,

v.

**DECLARATION OF
ERNEST WARREN, JR.
AMENDED MOTION
FOR A CONTINUANCE
OF TRIAL DATE**

ERIC LEE FLORES,

Defendant.

I, Ernest Warren, Jr., do depose and say:

1. I was appointed to represent defendant Eric Lee Flores on March 17, 2016, by the Honorable Anna Brown.
2. This is defendant's first amended request to continue the trial date.
3. The parties have discussed the fact that there are thousands of pages of discovery as well as videos and images. Defense Counsel needs time to review discovery, follow investigation leads, prepare and file motions, and advise the defendant on legal matters
4. Assistant United States Attorney Craig Gabriel does object to this request.
5. I, therefore, would request the Court to grant Motion for a Continuance of Trial until after December 6, 2016 due to a conflict in scheduling with the trial for **State v. Lawson 15-CR-26804**. Mr. Lawson was arraigned in June 2015.
6. Also, Mr. Flores does not object to this request.

**PAGE 2-DECLARATION IN SUPPORT OF AMENDED MOTION FOR A
CONTINUANCE OF TRIAL**

Warren & Sugarman
Attorneys at Law
838 SW First Avenue • Suite 500 • Portland, Oregon 97204
Tel (503) 228-6655 • Fax (503) 228-7019

DATED this 5th day of May, 2016.

RESPECTFULLY SUBMITTED,

/s/ Ernest Warren, Jr.

Ernest Warren, Jr. OSB No. 891384
Attorney for defendant

**PAGE 2—DECLARATION IN SUPPORT OF AMENDED MOTION FOR A
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CERTIFICATE OF SERVICE

I hereby certify that I have served a certified true copy of the **AMENDED MOTION TO CONTINUE TRIAL DATE AND DECLARATION IN SUPPORT OF AMENDED MOTION TO CONTINUE TRIAL DATE** in the attached matter upon the parties listed below by notice of electronic filing using the CM/ECF System as follows:

Ethan D. Knight
Craig J. Gabriel
Geoffrey A. Barrow
U.S. Attorney's Office
District of Oregon
1000 S.W. Third Avenue
Suite 600
Portland, OR 97204
503-727-1118
Fax: 503-727-1117

and filed the original with the Court on the date listed below.

DATED this 5th day of May, 2016.

WARREN & SUGARMAN

/s/Ernest Warren, Jr.
Ernest Warren, Jr. OSB No. 891384
Attorney for Defendant